

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS

Plaintiff,

-VS-

THE MIDDLE EAST FORUM,
DANIEL PIPES (*individually*),
GREGG ROMAN (*individually*), and
MATTHEW BENNETT (*individually*)

Defendants.

CIVIL ACTION NO. 2:19-cv-05030-JDW

CERTIFICATION OF COUNSEL

Jonathan R. Cavalier, counsel for The Middle East Forum, Daniel Pipes, Gregg Roman,
and Sidney L. Gold, counsel for Gregg Roman, collectively hereby certify as follows:

1. On July 13, 2020, Defendant Gregg Roman initiated a call with Daniel Thomas via WhatsApp.
2. Attorneys Cavalier and Gold were present for the entirety of the call between Roman and Mr. Thomas.
3. Exhibit 81, attached to Defendants Statement of Undisputed Facts, is a true and accurate reflection of the entirety of the call between Roman and Mr. Thomas.

We hereby certify that the foregoing statements made by us are true. We are aware that if any of the foregoing statements made by us are willfully false, we are subject to punishment.

Respectfully submitted:

/s/ Jonathan R. Cavalier

Jonathan R. Cavalier
Cozen O'Connor
1650 Market Street, Suite 2800
Philadelphia, PA 19103
(215) 446-0031

*Attorneys for Defendant
The Middle East Forum,
Daniel Pipes and Gregg Roman*

/s/ Sidney L. Gold

Sidney L. Gold
Sidney L. Gold & Associates, P.C.
1835 Market Street, Suite 515
Philadelphia, PA 19103
(215) 569-1999

*Attorneys for Defendant
Gregg Roman*